

RICHARD C. FELTMAN
Feltman Ewing, P.S.
421 West Riverside, Suite 1600
Spokane, Washington 99201
(509) 838-6800
Attorneys for Plaintiff
richf@feltmanewing.com

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

DAVID JANIASHVILI,

Plaintiff,

v.

MACK TRUCK LINES, INC. a
California corporation; JASPREET
SINGH; ARTUDIANTI, INC.; and
DACHI GOGOLADZE,

Defendants.

No.

COMPLAINT FOR DAMAGES
AND JURY DEMAND

Plaintiff, by and through his attorneys, John Gorey, Gorey Law Group, P.C.,
Richard C. Feltman and Feltman Ewing, P.S., hereby alleges as follows:

I. PARTIES

1. The Plaintiff is a citizen of The Borough of Brooklyn, State of New
York.

1 2. Mack Truck Lines, Inc. is a California corporation with is principal
2 place of business in California.

3
4 3. At all times relevant hereto, Jaspreet Singh is believed to be a citizen
5 of the State of California.

6 4. Artudianti, Inc. is an Illinois corporation with its principal place of
7 business in the State of Illinois.

8
9 5. At all times relevant hereto, Dachi Gogoladze is believed to be a
10 citizen of the State of Illinois.

11
12 II. JURISDICTION

13
14 6. This Court is vested with jurisdiction pursuant to 28 U. S. Code §
15 1332(a)(1) of the United States Code, in that the controversy exceeds the sum of
16 \$75,000.00 and there is diversity of citizenship among the parties to this action.

17
18 7. Venue is proper in the United States District Court for Eastern
19 Washington pursuant to 28 U.S. Code §1391(a)(2).

20
21 8. Plaintiff has fulfilled all jurisdictional prerequisites and conditions
22 prior to filing their Complaint.

III. FACTUAL ALLEGATIONS

9. On or about December 12, 2018, Plaintiff was a passenger in the sleeper berth of a tractor-trailer which was owned by Defendant, Artudianti, Inc., and being operated by Defendant, Dachi Gogoladze, in the scope of his employment, in a westerly direction on I-90 approaching Milepost 246.90 in the County of Lincoln, State of Washington.

10. At said time and place, Defendant, Mack Truck Lines, Inc., was the owner of a tractor-trailer which was being operated by Defendant, Jaspreet Singh, in the scope of his employment, in a westerly direction on I-90 at Milepost 246.90, in front of Defendant, Artudianti's vehicle.

11. At said time and place, Defendant, Jaspreet Singh, caused the tractor-trailer that he was operating to jackknife, causing both of the westbound lanes of I-90 to be completely blocked.

12. As a result of the position of Defendant, Jaspreet Singh's, tractor and trailer after it jackknifed, the taillights and brake lights were not visible to traffic traveling in a westerly direction toward the location of the jackknifed tractor-trailer.

1 13. At said time and place, Defendants, and each of them, negligently
2 drove, or allowed said vehicles to be negligently driven, so that as a direct and
3 proximate result thereof, Defendants vehicles collided, thereby greatly injuring and
4 damaging the Plaintiff.
5

6 14. Defendants, and each of them, had a duty to exercise ordinary care
7 toward the Plaintiff.
8

9 15. In breach of said duty, Defendants, Mack Truck Lines, Inc. and
10 Jaspreet Singh, were careless, negligent and reckless in the following respects:
11

- 12 a. Negligently operated the tractor-trailer at a speed that was too
13 fast for conditions;
14
15 b. Negligently failed to maintain the tractor-trailer within its
16 proper lane of traffic;
17
18 c. Negligently failed to maintain control of the tractor-trailer;
19
20 d. Negligently caused the tractor-trailer to jackknife;
21
22 e. Negligently blocked both lanes of westbound travel;
23
24 f. Negligently created an unreasonably dangerous condition on
25 the roadway; and
26
27 g. Were otherwise careless, reckless and negligent.

1 15. In breach of said duty, the Defendants, Artudianti, Inc. and Dachi
2 Gogoladze, were careless, reckless and negligent in the following respects:

- 3 a. Followed the Plaintiff's vehicle too closely in violation of
4 RCW 46.61.145;
5
6 b. Failed to decrease the speed of said vehicle so as to avoid
7 colliding with Jaspreet Singh's vehicle;
8
9 c. Failed to stop said vehicle in time to avoid said collision,
10 although he saw or should have seen, that it was impending and
11 had ample time and opportunity to avoid it;
12
13 d. Failed to see, hear and observe Jaspreet Singh's vehicle when it
14 could have and should have been seen, heard and observed;
15
16 e. Failed to keep said vehicle under proper control;
17
18 f. Operated said vehicle in a negligent manner in violation of
19 RCW 46.61.525;
20
21 g. Permitted the operation of said vehicle in a manner contrary to
22 the law in violation of RCW 46.61.765; and
23
24 h. Were otherwise careless, reckless and negligent.
25
26
27

WHEREFORE, Plaintiff prays for judgment, jointly and severally, against the Defendants, and each of them, , as follows:

- 1400 PAULSEN CENTER - 421 W. RIVERSIDE AVENUE
SPOKANE, WASHINGTON 99201-0495
509-838-6800; FACSIMILE: 509-744-3436

11. For such other and further relief as the Court may deem just and proper.

VI. JURY DEMAND

A jury trial is hereby requested.

DATED this _____ day of _____, 2020.

GOREY LAW GROUP, P.C.

FELTMAN EWING, P.S.

By: _____

John R. Gorey
Attorneys for Plaintiff

By: _____

Richard C. Feltman, WSBA #8320
Attorneys for Plaintiff

DATED this 1st day of December, 2020.

GOREY LAW GROUP, P.C.

By: 

John R. Gorey
Attorneys for Plaintiff

FELTMAN EWING, P.S.

By: 

Richard C. Feltman, WSBA #8320
Attorneys for Plaintiff